

Exhibit B



TO: KIM LUNDY- EMAIL
Walmart Inc.
GLOBAL GOVERNANCE/CENTRAL INTAKE, 2914 SE 1 STREET MS#0200
BENTONVILLE, AR 72712-3148

RE: **Process Served in Washington**

FOR: WALMART INC. (Domestic State: DE)

**Service of Process
Transmittal**
12/29/2021
CT Log Number 540811583

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Re: LOVELAND HESTER, in her individual capacity, // To: WALMART INC.

DOCUMENT(S) SERVED: Notice, Summons, Complaint

COURT/AGENCY: Clark County Superior Court, WA
Case # 2120240906

NATURE OF ACTION: Personal Injury - Slip/Trip and Fall - 12/29/2018 at 14505 Northeast Fourth Plain Boulevard in Vancouver, WA

ON WHOM PROCESS WAS SERVED: CT Corporation System, Olympia, WA

DATE AND HOUR OF SERVICE: By Process Server on 12/29/2021 at 15:31

JURISDICTION SERVED : Washington

APPEARANCE OR ANSWER DUE: Within 20 days after service, exclusive of the day of service

ATTORNEY(S) / SENDER(S): Sara Benson
Etengoff Pak Law Group
605 E. McLoughlin Blvd.
Vancouver, WA 98663
(360) 693-2919

ACTION ITEMS: CT has retained the current log, Retain Date: 12/29/2021, Expected Purge Date: 01/03/2022

Image SOP

REGISTERED AGENT ADDRESS: C T Corporation System
711 Capitol Way S
Suite 204
Olympia, WA 98501
877-564-7529
MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

12-20-2021, 15:28

**Scott G. Weber, Clerk
Clark County**

IN THE SUPERIOR COURT OF WASHINGTON FOR CLARK COUNTY

9 HESTER LOVELAND, in her individual)
10 capacity,) NO. 21-2-02409-06
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TO: WALMART INC., d/b/a/ WALMART SUPERCENTER #5461

A lawsuit has been started against you in the above-entitled Court by the Plaintiff. Plaintiff's claim is stated in the written Complaint, a copy of which is served upon you with this Summons.

In order to defend against this lawsuit, you must respond to the Complaint by stating your defense in writing, and by serving a copy upon the person signing this Summons within 20 days after the service of this Summons, excluding the day of service, if served upon you within this State, and within 60 days after the service of this Summons is served upon you outside of Washington, excluding the day of service, or a Default Judgment may be entered against you without notice. A Default Judgment is one where Plaintiff is entitled to what she asks for because you have not responded. If you serve a Notice of

1 Appearance on the undersigned person, you are entitled to notice before a Default Judgment may be
2 entered.

3 You may demand that the Plaintiff file this lawsuit with the Court. If you do so, the demand must
4 be in writing and must be served upon the person signing this Summons. Within 14 days after you serve
5 the demand, the Plaintiff must file this lawsuit with the Court, or the service on you of this Summons and
6 Complaint will be void.

7 If you wish to seek the advice of an attorney in this matter, you should do so promptly so that
8 your written response, if any, may be served on time.

9
10 This Summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the State of
11 Washington.

12 DATED: This 20th day of December, 2021.
13

14 **FILE RESPONSE WITH:**

15 Clerk of the Court
16 Clark County Courthouse
17 1200 Franklin Street
P.O. Box 5000
Vancouver, WA 98666-5000

ETENGOFF PAK LAW GROUP

By: /s/ Sara A. Benson

James L. Pak, WSBA No. 28399
Sara Benson, WSBA No. 56274
605 E. McLoughlin Blvd.
Vancouver, WA 98663
Attorneys for Plaintiff

12-20-2021, 15:28

Scott G. Weber, Clerk
Clark County

IN THE SUPERIOR COURT OF WASHINGTON FOR CLARK COUNTY

9 HESTER LOVELAND, in her individual)
10 capacity,) NO. 21-2-02409-06
11 Plaintiff,)
12 vs.)
13 WALMART INC., a foreign corporation, d/b/a)
14 WALMART SUPERCENTER #5461,)
15 Defendant.)
16

16 TO: WALMART INC., d/b/a WALMART SUPERCENTER #5461

17 Plaintiff, by and through her attorneys, alleges and complains as follows:

18 **I. PARTIES, JURISDICTION AND VENUE**

19 1. Plaintiff HESTER LOVELAND (hereinafter "Plaintiff"), is and was a resident of Clark
20 County, Washington, at all times relevant herein.

22 2. Upon information and belief, Defendant WALMART INC., is a foreign corporation
23 doing business as WALMART SUPERCENTER #5461 (hereinafter "Defendant"), that owned,
24 operated, and controlled the premises of the Walmart store located at 14505 NE Fourth Plain
25 Boulevard, Vancouver, Washington 98682.

3. The court has jurisdiction and venue over the Defendant, the subject matter, and personas of the parties pursuant to RCW 4.12.020(3) and RCW 4.12.025.

II. FACTS OF INCIDENT

4. On or about December 29, 2018, at approximately 9:30 a.m., Plaintiff entered the Walmart store located at 14505 Northeast Fourth Plain Boulevard in Vancouver, Washington. As Plaintiff proceeded through the front door, she tripped over a mat that was not lying flat against the floor near the entryway and fell forward to the ground suffering serious personal injuries.

5. There were no signs or other warnings posted in the area to warn her of the hazardous condition on the ground.

III. NEGLIGENCE

6. Defendant had a duty to use due care in the maintenance its property.

7. Defendant breached its duty by:

- a) failing to make the premises reasonably safe;
 - b) failing to exercise reasonable care to inspect for and/or discover

conditions on the premises that create an unreasonable risk of harm;

- c) failing to eliminate the hazardous condition;

- d) failing to warn of the unreasonable risk of harm; and

- e) failing to take reasonable precautions to protect

conditions on the premises.

8. As a direct and proximate result of the foregoing negligence of Defendant, Plaintiff suffered significant bodily injuries and has suffered economic and noneconomic damages in amounts to be proven at trial.

1 WHEREFORE, Plaintiff prays for judgment against the Defendant in the amount that will
2 fairly compensate Plaintiff for all damages sustained, physical disability and pain, emotional trauma,
3 medical expenses, costs, reasonable attorney's fees, interest calculated at the maximum amount
4 allowable by law, and other relief the Court deems just.

5 DATED this 20th day of December, 2021
6

7 ETENGOFF PAK LAW GROUP
8

9 /s/ Sara A. Benson
10

11 James L. Pak, WSB #28399
12 Sara A. Benson, WSB #56274
13 605 E. McLoughlin Blvd.
14 Vancouver, WA 98663
15 jim@etengofflaw.com
16 sara@etengofflaw.com
17 *Attorneys for Plaintiff*